

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

DIEGO PAVIA,

Plaintiff,

v.

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

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Case No. 3:24-cv-01336

Judge William L. Campbell, Jr.

DECLARATION OF PAUL GRINDSTAFF

I, Paul Grindstaff, declare as follows:

1. I am the Executive Director of Anchor Impact, Inc. (“Anchor Impact”), the NIL collective of Vanderbilt athletics. Anchor Impact works to offer name, image, and likeness (“NIL”) opportunities to Vanderbilt football players including Diego Pavia.

2. Based on my understanding of current NCAA Bylaws, Diego Pavia will not have any years of eligibility left to play football at Vanderbilt after this season. Accordingly, Anchor Impact is not currently reserving any money or NIL opportunities for Pavia.

3. Anchor Impact plans to offer NIL opportunities to student athletes on the Vanderbilt football roster next year. Accordingly, Anchor Impact will consider offering NIL money to current Vanderbilt quarterbacks who have eligibility for next season as well as quarterbacks in the NCAA transfer portal who may transfer and enroll at Vanderbilt University.

4. Anchor Impact has a limited NIL budget and cannot reserve money for Pavia unless and until a court grants him injunctive relief against enforcement of the NCAA Bylaws limiting his eligibility. Once Anchor Impact commits its limited NIL money to other quarterbacks, it does

not anticipate having resources with which to offer NIL opportunities to Pavia in the event a court later provides Pavia with injunctive relief.

5. However, to the extent the Court grants Pavia the *immediate* injunctive relief he is requesting, Anchor Impact will absolutely reserve funding for NIL opportunities for Pavia and work to secure additional NIL opportunities for him. To ensure that Anchor Impact has money available for Pavia, it intends to be negotiating NIL terms with Pavia in advance of the opening of the transfer portal on December 9, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 6, 2024



Paul Grindstaff